



# COMPRESSED GAS ASSOCIATION, INC.

1725 JEFFERSON DAVIS HWY. ■ ARLINGTON, VA 22202-4102 ■ (703)412-0900 ■ FAX (703)412-0128

QA  
17910

16 August 1993

FHWA Docket No. MC92-4  
Office of the Chief Counsel  
Room 4232  
Federal Highway Administration  
400 Seventh Street, S.W.  
Washington, D.C. 20590

FHWA 97-2180-18

RECEIVED  
FEDERAL HIGHWAY ADMINISTRATION  
AUG 21 1993

Re: Docket MC92-4

Dear Sir/ Madam:

The Compressed Gas Association (CGA), founded in 1913, represents over two hundred member companies worldwide in the development and promotion of safety standards and safe practices in the industrial gas and specialty gas industry. The Association represents all facets of the industry - manufacturers, distributors, equipment suppliers, and transporters. Through the committee systems, CGA creates technical specifications, safety standards, training and educational materials; and also works with government agencies to formulate responsible regulations and standards and to promote compliance with these regulations and standards.

The Association participated in the legislative process which led to the passage of the Hazardous Materials Transportation Uniform Safety Act of 1990 and therefore is interested in the Safety Permit Requirement contained in Section 8 of the Act. CGA submits the following comments:

- Definitions of Designated High Risk Hazardous Materials: Part 397.43 of the Proposed Regulations defines "a liquefied natural gas" as in bulk and falling within RSPA hazard classification 2.1. This description appears to be broad and unclear. CGA requests that FHWA clarify the definition.
- Need for Coordination between FHWA and RSPA in This Proceeding: The background information notes that RSPA will be developing a separate rule making to deal with shipper responsibilities under Safety Permits. We urge that both agencies coordinate their efforts as to definitions, implementation dates, etc.
- Standards for Determining Commodities that Qualify for the High Hazard Designation: CGA notes that no standards are provided either in the Act or the Proposed Rules for

FHWA Docket No. MC92-4  
16 August 1993  
Page Two

determining whether a particular material should be classified as a " high hazard".  
Standards should be available for consistent application of regulations.

The Compressed Gas Association appreciates the opportunity to comment on this rule making and is available to assist the FHWA in completing this docket.

Yours Truly,



Owen C. Baker  
Staff Manager



f:\cga sys word\commanmc92.doc

FHWA DOCKET mc-92-4-19  
PAGE 2 OF 2